

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

IN RE:	§	CHAPTER 11
	§	
HII TECHNOLOGIES, INC., ET AL., ¹	§	15-60070 (DRJ)
	§	(JOINTLY ADMINISTERED)
DEBTORS.	§	

JOINDER TO RESPONSES IN OPPOSITION TO MOTION TO OBTAIN POST-PETITION FINANCING

TO THE HONORABLE DAVID R. JONES, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW creditor and party-in-interest Christopher George (“**George**”) and files this Joinder to Responses in Opposition to Motion to Obtain Post-Petition Financing, respectfully showing as follows:

1. George is the former owner of debtor Aqua Handling of Texas, LLC (“**Aqua-Tex**”). George sold Aqua-Tex to debtor HII Technologies, Inc. (“**HIIT**”). George is a secured creditor of HIIT with respect to debts owed in connection with the purchase of Aqua-Tex. George is also a former employee of Aqua-Tex and HIIT. George is owed substantial amounts from Aqua-Tex and HIIT in connection with his employment as well as from the debtors’ breach of his employment contract.

2. On September 18, 2015, Debtors filed their Emergency Motion for Entry of Interim and Final Orders (A) Authorizing Use of Cash Collateral and Granting Adequate Protection to Prepetition Lender and (B) Scheduling a Final Hearing (the “**Motion**”). Doc. No. 7.

3. On October 1, 2015, the Ad Hoc Committee of Creditors of Apache Energy Services, Inc. filed its Response to Post-Petition Financing (the “**AHCC Response**”). Doc. No. 80.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: (1) Apache Energy Services, LLC (4404); (2) Aqua Handling of Texas, LLC (4480); (3) HII Technologies, Inc. (3686); (4) Sage Power Solutions, Inc. f/k/a KMHVC, Inc. (1210); and (5) Hamilton Investment Group, Inc. (0150).

4. On October 1, 2015, the Official Committee of Unsecured Creditors of HIIT filed its Response to the Debtors' Emergency Motion for Entry of Interim Orders (A) Authorizing Debtors to Obtain Post-Petition Financing; (B) Authorizing Use of Cash Collateral; and (C) Granting Adequate Protection to the DIP Lenders (the "**OCUC Response**"). Doc. No. 82.

5. George adopts by reference the AHCC Response and the OCUC Response. Likewise, George requests the Motion be denied.

WHEREFORE, PREMISES CONSIDERED, George prays the Court deny the Motion, and award George all such other and further relief, both general and special, at law or in equity, to which George may be entitled.

Respectfully submitted,

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ATTORNEYS FOR CHRISTOPHER GEORGE

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of October, 2015, I filed the foregoing document utilizing the CM/ECF system, thereby effecting service on the all parties registered for ECF notice in this case.

/s/ Lance H. "Luke" Beshara
Lance H. "Luke" Beshara